

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

JULIE DALESSIO, an individual,

Plaintiff,

v.

UNIVERSITY OF WASHINGTON, ET.
AL.

Defendant.

No. 2:17-cv-00642-MJP

DECLARATION OF JOSEPH THOMAS IN
SUPPORT OF MEETING AND
CONFERRING FOR MOTION TO COMPEL
INITIAL DISCLOSURES

Note on Motion Calendar October 26, 2018

I, Joseph Thomas, declare as follows:

1. I am the court-appointed pro bono counsel for Plaintiff Julie Dalessio in this above entitled lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.
2. Throughout at least the last five months, I have addressed the insufficiency of Defendants' initials with the attorneys for Defendants. In multiple telephonic conferences and email exchanges I have discussed with defense counsel the continued

Declaration
Case 2:17-cv-00642

insufficiency of Defendants' initial disclosures.

Law Office of Joseph Thomas
14625 SE 176th St., Apt. N101
Renton, Washington
Phone (206)390-8848

- 1 3. Attached hereto as **Exhibit A** is a true and correct copy of a letter from Defendants’
2 attorney Special Assistant Attorney General Jayne Freeman to myself (Joseph
3 Thomas) on April 30, 2018.
- 4 4. Even before April 30, 2018, I spoke with Ms. Freeman about the sufficiency of initial
5 disclosures produced on June 01, 2017. Ms. Freeman addressed my concerns
6 regarding the initial disclosures towards the end of her letter that all of the documents
7 that will be used to defend against Plaintiff’s claims have been produced. Ex. A at 5-
8 6.
- 9 5. Attached hereto as **Exhibit B** is a true and correct copy an email from Defendants’
10 attorney Special Assistant Attorney General Jayne Freeman to myself (Joseph
11 Thomas) on May 18, 2018.
- 12 6. After April 30, 2018, I continued to talk to Ms. Freeman about the sufficiency of
13 Defendants initial disclosures. Because of my conversations with Ms. Freeman, she
14 emailed me and stated that in Defendants first supplemental initial disclosures she
15 “attempted to add as much information as possible in one place in an attempt to
16 address various discovery questions you have raised in the past.” Ex. B.
- 17 7. Attached hereto as **Exhibit C** is a true and correct copy of an email from myself
18 (Joseph Thomas) to Defendants’ attorney Special Assistant Attorney General Jayne
19 Freeman on May 24, 2018.
- 20 8. In this May 24, 2018, email I took great pain to detail the insufficiencies of
21 Defendants’ initial disclosures. I felt that if I wrote it all down in an email it would be
22 easy to reference for both parties.
- 23 9. Attached hereto as **Exhibit D** is a true and correct copy of an email from myself
24 (Joseph Thomas) to Defendants’ attorney Special Assistant Attorney General Jayne
25 Freeman on July 12, 2018.
- 26 10. This is another email where I try to address the insufficiency of Defendants’ initial
27 disclosures with defense counsel. Unfortunately at this point it took weeks to get
28 ahold of defense counsel to discuss the insufficiency of Defendants initial disclosures.

1 11. Attached hereto as **Exhibit E** is a true and correct copy of an email from myself
2 (Joseph Thomas) to Defendants' attorney Special Assistant Attorney General Jayne
3 Freeman on August 08, 2018.

4 12. The August 08, 2018 email is another attempt to try to address the insufficiency of
5 Defendants' initial disclosures with defense counsel.

6 13. In addition to all of the emails, on August 23, 2018 and September 20, 2018, I had
7 telephonic conferences with Ms. Freeman and Mr. Derek Chen, at least in part initial
8 disclosures.

9 14. I declare under penalty of perjury under the laws of the State of Washington that the
10 foregoing is true and correct to the best of my knowledge.

11 15. I believe I have satisfied the court rules concerning meeting and conferring for
12 motions to compel disclosure of initial disclosures.

13
14 DATED this 20th day of September, 2018, at Renton, Washington.

15
16
17 /s/ Joseph Thomas
18 Joseph Thomas
Attorney for Plaintiff WSBA # 49532

19 **Certificate of Service**

20 I hereby certify that on 27 of September 2018, I filed the foregoing with the Clerk of the
21 Court through the CM/ECF system which will automatically send electronic mail notification of
22 such filing to the CM/ECF registered participants as identified on the Electronic Email Notice
23 List.

24 /s/ Joseph Thomas
25 Joseph Thomas, WSBA 49532
26 14625 SE 176th St., Apt. N101
27 Renton, WA 98058
28 (206) 390-8848